

O'MELVENY & MYERS LLP

BEIJING
BRUSSELS
CENTURY CITY
HONG KONG
JAKARTA†
LONDON
LOS ANGELES

RECEIVED Times Square Tower
Times Square
New York, New York 10036
JUN 20 2012 TELEPHONE (212) 326-2000
FACSIMILE (212) 326-2061
www.omm.com

HAROLD BAER
U.S. DISTRICT JUDGE
S.D.N.Y.

NEWPORT BEACH
SAN FRANCISCO
SHANGHAI
SILICON VALLEY
SINGAPORE
TOKYO
WASHINGTON, D.C.

June 19, 2012

VIA FACSIMILE AND FEDEX

Honorable Harold Baer, Jr.
United States District Judge
United States Courthouse
500 Pearl Street
Room 2230
New York, NY 10007

USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED 6/20/12

OUR FILE NUMBER
336,915-002

WRITER'S DIRECT DIAL
(212) 326-4403

WRITER'S E-MAIL ADDRESS
mracanelli@omm.com

Re: United States v. Carollo, et al., S1 10 Cr. 654 (HB)

Dear Judge Baer:

We write of behalf of Peter Grimm, a defendant in the above-referenced case, to respectfully request permission for Mr. Grimm to fulfill his pretrial services reporting obligations by phone *in lieu* of monthly in-person meetings. Telephonic reporting must be court ordered, but it is a common practice that would allow Mr. Grimm to report to his assigned officer without having to travel from suburban New Jersey, where he resides, to Newark or New York City every month.

We have spoken with Clay Smith, Mr. Grimm's assigned Pretrial Service Officer, and he has no objection to court-ordered telephonic reporting; the government has taken the same position as Pretrial Services. We are happy to provide additional information at the Court's request.

Respectfully submitted,

Mark Racanelli
Mark Racanelli
O'Melveny & Myers LLP
6/20/12
Harold Baer, Jr.
6/20/12

cc: Counsel of Record (*via* e-mail)
Clay Smith, PSO (*via* e-mail)

Endorsement:

If the AUSA and Pretrial Services have no objection as you say its OK with me to do telephone interviews at first every other month and intervening month he will report in person.